

## **REMARKS**

**[0002]** Herein "Office Action" or "Action" refers to the Office Action dated January 23, 2008.

**[0003]** Applicant respectfully requests entry of the following remarks and reconsideration of the subject application. Applicant respectfully requests entry of the amendments herein. The remarks and amendments should be entered under 37 C.F.R. §1.116 as they place the application in better form for appeal, or for resolution on the merits.

**[0004]** Applicant respectfully requests reconsideration and allowance of all of the claims of the application. Claims 16, 18-23, and 61-74 are presently pending. Claims 16, 18-19, 22-23, 61-63, and 68-74 are amended herein. No claims are withdrawn or cancelled herein. No new claims are added herein.

### **Formal Request for an Interview**

**[0005]** If the Examiner's reply to this communication is anything other than allowance of all pending claims, then I formally request an interview with the Examiner. I encourage the Examiner to call me—the undersigned representative for the Applicant—so that we can talk about this matter so as to resolve any outstanding issues quickly and efficiently over the phone.

**[0006]** Please contact me or my assistant to schedule a date and time for a telephone interview that is most convenient for both of us. While email works

great for us, I welcome your call to either of us as well. Our contact information may be found on the last page of this response.

### **Claim Amendments**

[0007] Without conceding the propriety of the rejections herein and in the interest of expediting prosecution, Applicant amends claims 16, 18-19, 22-23, 61-63, and 68-74 herein.

### **Formal Matters**

[0008] This section addresses any formal matters (e.g., objections) raised by the Examiner.

### **Specification**

[0009] The Examiner objects to various paragraphs of the specification for miscellaneous typographical and other errors. Herein, Applicant amends several of the paragraphs of the Specification, as shown above, to correct the informalities noted by the Examiner.

[0010] As to "cachekey," the Examiner asserts that there is no common definition for this word and that "cachekey" has not been defined in the specification. The Applicant respectfully disagrees.

[0011] The Applicant asserts that "cachekey" does have sufficient common meaning to enable one having ordinary knowledge in the relevant field(s) to understand and practice what is described in the Specification. For example, the

term is used by those who program in the Java programming language. In particular, Cachekey has been used as a class in the Java programming language in the package org.hibernate.cache. Other instances of use of the term cachekey are publicly available.

**[0012]** In addition, the Applicant is free to define terms within the Specification even to the point of defining words contrary to their ordinary meaning. See MPEP 706.03(d), ¶ 7.34.02, and *Process Control Corp. v. HydReclaim Corp.*, 190 F.3d 1350, 1357, 52 USPQ2d 1029, 1033 (Fed. Cir. 1999).

**[0013]** Further, the Applicant asserts that the plain meaning of the word “cachekey” (broken into its constituent parts) combined with the Specification provides adequate definition of this term and no amendment to the Specification is necessary in this regard. For Example, in paragraph 52, the Specification states that the “NameHash is employed as a cachekey for storage of client-specific data in the primary cache memory.” The Applicant asserts that a person having ordinary skill in the art would know what a cachekey is and how to use it within the use of this term in the Specification. The Applicant respectfully asks the Examiner to withdraw the objection to this term.

**[0014]** Finally, the objection to the use of cachekey is made moot. In order to clarify cachekey, the Specification has been amended in this Response (as shown above) such that “cachekey” now is written “cache key.” If the Examiner persists in the objection to this term in the Specification, and in the rejection of claims containing “cachekey,” the Applicant respectfully asks the Examiner for more particular direction as to how to remedy such objection and/or rejection.

## **Drawings**

[0015] The Examiner objects to Figures 5, 6 and 7 because "it is not clear that the first two steps in each flow chart . . . are performed at different locations." Applicant submits replacement drawings to correct the informalities noted by the Examiner.

## **Claims**

[0016] The Examiner objects to claims 8, 16, 18, 22-23, 61, 63 and 68-74 for various typographical and grammatical errors. Herein, Applicant amends these claims, as shown above, to correct the informalities noted by the Examiner. The objections are thereby made moot. The Applicant respectfully asks the Examiner to withdraw the objection to these claims.

## **Substantive Matters**

### **Claim Rejections under § 112, First Paragraph**

[0017] Claims 62 and 69-74 are rejected under 35 U.S.C. § 112, First Paragraph for failing to comply with the enablement requirement. The Applicant traverses this rejection.

[0018] The Examiner asserts that the term "cachekey" is indefinite because it supposedly does not have any meaning in the art and that undue experimentation would be required. The Applicant respectfully disagrees.

**[0019]** The Applicant asserts that "cachekey" has sufficient meaning to enable one having ordinary knowledge in the relevant field(s) to understand and practice what is described in the Specification. For example, the term is used by those who program in the Java programming language. In particular, Cachekey has been used as a class in the Java programming language in the package org.hibernate.cache. Other instances of the use of cachekey are publicly available.

**[0020]** The Applicant also asserts that the plain meaning of the word "cachekey" (broken into its constituent parts) combined with the Specification provides adequate definition of this term and no amendment to the Specification is necessary in this regard. For Example, in paragraph 52, the Specification states that the "NameHash is employed as a cachekey for storage of client-specific data in the primary cache memory." The Applicant asserts that a person having ordinary skill in the art would know that a cachekey can be a key which is used in the sense of a database and that this key can be used to access or look up or find other data in "cache memory" as stated in the Detailed Description. The Applicant respectfully asks the Examiner to withdraw the rejection on at least this basis.

**[0021]** Finally, the rejection of claims 61-74 based on the use of cachekey is made moot. In order to clarify cachekey, these claims have been amended as shown above such that "cachekey" now is written "cache key." If the Examiner persists in the rejection of these claims for the use of "cache key," the Applicant respectfully asks the Examiner for more particular direction as to how to remedy the rejection.

### **Claim Rejections under §112 Second Paragraph**

[0022] Claims 61-74 are rejected under 35 U.S.C. § 112, Second Paragraph, as being indefinite. In light of the amendments presented herein, Applicant submits that these rejections are moot. Accordingly, Applicant asks the Examiner to withdraw these rejections.

### **Claim Rejections under § 103**

[0023] The Examiner rejects claims 16, 18-23 and 61-74 under § 103. For the reasons set forth below, the Examiner has not made a prima facie case showing that the rejected claims are obvious.

[0024] Accordingly, Applicant respectfully requests that the § 103 rejections be withdrawn and the case be passed along to issuance.

[0025] The Examiner's rejections are based upon the following references alone and/or in combination:

- **Newcombe:** *Newcombe, et al.*, US Patent Publication No. 2003/0172269 (published September 11, 2003); and
- **Chang:** *Chang, et al.*, US Patent No. 6,952,781 (issued October 4, 2005).

### **Overview of the Application**

[0026] The Application describes a process for requesting authentication which includes transmitting a hash digest formed from first set of client-specific data together with a second set of client-specific data and receiving, in response,

an indication of acceptance when the hash digest and second client-specific data correspond to a valid client authentication request. (Application, Abstract)

### **Cited References**

**[0027]** The Examiner cites Newcombe as the primary reference in the obviousness-based rejections. The Examiner cites Chang as a secondary reference in the obviousness-based rejections.

#### **Newcombe**

**[0028]** Newcombe describes a method and system for enabling authentication in a distributed environment. The method employs a hashed salted password associated with a user in part to pre-authenticate the user. If the user is pre-authenticated, a ticket is transmitted to a client. The ticket includes a cryptographic digest of a concatenation of the local and remote addresses that is exclusive or'ed with a timestamp to generate a modified authenticator. The modified authenticator is directed at binding the timestamp to the client to minimize reuse of an authenticator. A packet that includes the authenticator is sent to a server. The server is configured to determine another remote and local IP address associated with the packet. Employing the remote and local addresses, the server extracts the timestamp from the modified authenticator. If the timestamp is within a pre-determined time window, the user may be authenticated. (Newcombe, Abstract)

Chang

**[0029]** Chang describes a mechanism for establishing a plurality of sessions between a client and a first server based on a single input of user authenticating information. A request to establish a connection between the client and the first server is received. The request includes identification information for authenticating a requesting user. Based on the identification information, a determination is made as to whether the connection between the client and the first server should be established. If it is determined that the connection between the client and the first server should be established, the identification information is cached in memory and the connection between the client and the first server is allowed to be established. Subsequent connection requests from the same client are authenticated, and further connections can be established, based on the cached identification information, without further input from the client or user. (Chang, Abstract)



## **Obviousness Rejections**

### **Lack of *Prima Facie* Case of Obviousness (MPEP § 2142)**

**[0030]** Applicant disagrees with the Examiner's obviousness rejections. Arguments presented herein point to various aspects of the record to demonstrate that all of the criteria set forth for making a prima facie case have not been met.

**[0031]** To show obviousness, the Examiner must show that the combination of references teach or suggest each and every feature of a claim under 35 U.S.C. § 103, despite any recent revision to the Manual of Patent Examining Procedure (MPEP). Section 2143.03 of the MPEP requires the "consideration" of (teach or suggest) every claim feature in an obviousness determination. *See In re Royka*, 490 F.2d 981, 180 USPQ 580 (CCPA 1974) (to establish prima facie obviousness of a claimed invention, all the claim features must be taught or suggested by the prior art).

**[0032]** As the Board of Patent Appeal and Interferences has recently confirmed, a proper obviousness determination requires that an Examiner make "a searching comparison of the claimed invention – including all its limitations – with the teaching of the prior art." *See In re Wada and Murphy*, Appeal 2007-3733, citing *In re Ochiai*, 71 F.3d 1565, 1572 (Fed. Cir. 1995). Further, the necessary presence of all claim features is axiomatic, since the Supreme Court has long held that obviousness is a "question of law based on underlying factual inquiries, including ... ascertaining the differences between the claimed invention and the prior art." *Graham v. John Deere Co.*, 383 U.S. 1, 148 USPQ 459 (1966).

**[0033]** Indeed, the Applicant submits that this is why Section 904 of the MPEP instructs Examiners to conduct an art search that covers “the invention as *described and claimed*.” (emphasis added). Lastly, the Applicant respectfully directs attention to MPEP § 2143, the instructions of which buttress the conclusion that obviousness requires at least a suggestion of all of the features of a claim, since the Supreme Court in *KSR Int’l v. Teleflex Inc.* stated that “there must be some articulated reasoning with some rational underpinning to support the legal conclusion of obviousness.” *KSR Int’l v. Teleflex Inc.*, 127 S. Ct. 1727, 1741 (2007) (quoting *In re Kahn*, 441 F.3d 977, 988 (Fed. Cir. 2006)).

**[0034]** In sum, it remains well-settled law that obviousness requires at least a suggestion of all of the features in a claim. *See In re Wada and Murphy*, citing *CFMT, Inc. v. Yieldup Intern. Corp.*, 349 F.3d 1333, 1342 (Fed. Cir. 2003) and *In re Royka*, 490 F.2d 981, 985 (CCPA 1974)).

#### **Based upon Newcombe and Chang**

**[0035]** The Examiner rejects claims 16, 18-23 and 61-74 under 35 U.S.C. § 103(a) as being unpatentable over Newcombe in view of Chang. Applicant respectfully traverses the rejection of these claims and asks the Examiner to withdraw the rejection of these claims.

Independent Claim 16

[0036] The Applicant asserts that claim 16, as amended, is allowable over the combination of Newcombe and Chang because none of these references, either alone or in combination, discloses, teaches or suggests at least the following elements as recited in this amended claim (with emphasis added):

“if comparing determines that the client specific data do not meet the first threshold of validity, then **storing in a second cache memory** a portion of the client specific data **and an indication that the client specific data do not correspond to a valid client**, wherein the portion of the client specific data and the indication **stored in the second cache memory identifies a client name** associated with the client authentication request and **associates the client name with a negative indication of validity** regardless of whether the client specific data includes valid proof of knowledge of privileged data, and then terminating the verification process.”

[0037] The Examiner admits (Action, p. 13) that Newcombe does not disclose the use of a cache memory. By implication, Newcombe cannot be used to teach or suggest actions or steps of storing or other act involving a cache memory. The Application at length describes why the use of cache memory is a feature of this claim. The Examiner thus must rely on Chang to show the use of a cache memory as recited in claim 16.

[0038] The Examiner indicates (Action, p. 14) that Chang, at col. 4, lines 17-24, and at col. 6, lines 2-3 and 47-50, discloses “storing in a second cache memory a portion of the client specific data and an indication that the client

specific data do not correspond to a valid client” as recited in claim 16. The Applicant respectfully disagrees.

**[0039]** For convenience, Chang, col. 4, lines 17-24, is presented here:

In one embodiment, a Smart card or Token card is used to obtain an OTP that can be used to establish a session with the network access server. In response to entering the  
15 username and one-time password, a user authorization phase is performed to determine whether a session should be established for the particular user. To perform the user authorization phase, the network access server forwards the username and one-time password to an authorization,  
20 authentication, and accounting (AAA) server to request authorization for establishing a session. The AAA server determines whether the username and OTP were previously cached in its memory and if so, whether the username and OTP are still valid.

**[0040]** As can be seen, Chang discloses a “username and one-time password” (OTP) and a “server determines whether the username and OTP were previously cached in memory.” There is just a single or first cache memory in this portion of Chang. Further, in this passage of Chang, there is no disclosure, teaching or suggestion of determining or storing “an indication that the client specific data do not correspond to a valid client” as recited in claim 16, as amended. Thus, this portion of Chang does not support the Examiner’s assertion.

**[0041]** Chang, col. 6, lines 2-3, state the following:

As depicted AAA server 126 includes a cache that may be used to store username and one-time password information.

**[0042]** Chang, col. 6, lines 47-50, is presented here:

Conversely, if the OTP is not valid, at block **316** the AAA server **126** sends a message to network access server **104** indicating that a session can not be established based on the user identification information.

**[0043]** As can be seen, Chang discloses sending a message to a "network access server" that a "session can not be established." As shown above, Claim 16, as amended, recites "storing in a . . . cache memory . . . an indication that the client specific data do not correspond to a valid client, wherein the portion of the client specific data and the indication stored in the . . . cache memory identifies a client name associated with the client authentication request and associates the client name with a negative indication of validity."

**[0044]** If the Examiner's assertion is true that Chang discloses what is recited in claim 16, the Examiner is equating sending a message to a server (Chang) with "storing . . . an indication" in a cache memory (claim 16).

**[0045]** However, sending a message about the failure to authenticate is not the same as storing in a memory a client name or "portion of . . . client specific data" (e.g. an output of a hash function) along with a "negative indication." The benefits and advantages of storing an indication are described at length in the detailed description of the Application. In particular, by sending a message, an authentication system is left unchanged. In contrast, if implementing a system as recited in claim 16, an authentication system is improved. Thus, Chang fails to disclose, teach or suggest at least this substantial feature of claim 16.

**[0046]** Accordingly, the combination of Newcombe and Chang does not disclose, teach or suggest all of the claimed elements or features of claim 16.

Accordingly, Applicant respectfully asks the Examiner to withdraw the rejection of this claim, as amended.

*Dependent Claims 18-23*

**[0047]** These claims ultimately depend upon independent claim 16. As discussed above, claim 16 is allowable. It is axiomatic that any dependent claim which depends from an allowable base claim is also allowable. Additionally, some or all of these claims may also be allowable for additional independent reasons.

**[0048]** For example, claim 18, as amended, recites the following features (with emphasis added):

“comparing the client specific data with data stored in the second cache memory to determine **whether the client specific data meet a second threshold of validity and whether the client specific data correspond to an identity previously determined to be valid or invalid;** and

**“if the client specific data meet the second threshold, transmitting a request for verification to a database containing client specific data.”**

**[0049]** The Examiner asserts the following in regard to this claim:

In reference to Claim 18, Newcombe and Chang further disclose comparing the client specific data with data stored in a second cache memory to determine when the client specific data meet a second threshold of validity and when the client specific data correspond to an identity previously determined to be valid or invalid (Newcombe, paragraphs 0025, 0063-0064; Chang, column 4, lines 17-24; column 6, lines 2-3 and 47-50); transmitting a request for verification to a database containing client-specific data when the client specific data meet the second threshold (Newcombe, paragraphs 0042, 0059, 0061-0062); and terminating the authentication request when the client specific data correspond to an identity previously determined to be invalid (Chang, column 6, lines 47-50).

**[0050]** The Applicant respectfully disagrees that these references teach or suggest each and every feature of claim 18. First, neither Newcombe and Chang explicitly disclose a "second threshold of validity." The Examiner cites to Chang, col. 4, lines 17-24, and col. 6, lines 2-3 and lines 47-50. As shown above, these sections of Chang only disclose checking the validity of one item, a "one-time password." Thus, Chang does not disclose meeting a "second threshold of validity" as recited in claim 18.

**[0051]** The Examiner also cites to various parts of Newcombe including para. 0025, and 0063-0064.

**[0052]** With reference to paragraph 0025, Newcombe discloses the use of a timestamp, and two IP addresses. However, in these passages, there is no mention of authenticating multiple times or multiple items. Other teachings of Newcombe appear to be equally unavailing to show a second "threshold of validity." For example, in paragraph 0061 of Newcombe, the system described

may extract the client's remote IP address from a packet header and compare this address against the IP address "from within the request."

**[0053]** This mechanism of Newcombe is substantially different from the language of claims 16 and 18. Specifically, claim 18 recites that "whether the client specific data correspond to an identity **previously determined to be valid or invalid**" (emphasis added). None of the paragraphs of Newcombe cited by the Examiner, paragraphs 0025, 0042, 0056, and 0061-0064, teach or suggest accessing information indicating whether an identity has been "previously determined to be valid" or invalid. This feature of claim 18 should not be ignored, and this is at least one substantive difference between claim 18, as amended, and the combination of Newcombe and Chang.

**[0054]** Further, upon close inspection, these two references do not disclose the following features of claim 18: "if the client specific data meet the second threshold, transmitting a request for verification to a database containing client specific data." Even if an IP address or timestamp or other piece of data of Newcombe is considered a "second" threshold, there is no teaching or suggesting of transmitting a request "for verification" to a database of "client specific data" after passing a second threshold. The Examiner cites to Newcombe, paragraphs 0042, 0059, and 0061-0065. However, these paragraphs are devoid of this teaching and do not suggest a transmitting to a database, and especially not of transmitting to a database after passing a second threshold. Accordingly, this is at least one additional substantive difference between claim 18, as amended, and the combination of Newcombe and Chang.



[0055] Based on at least these additional differences, claim 18, as amended, is allowable over the combination of Newcombe and Chang.

Independent Claim 61

[0056] The Applicant asserts that claim 61, as amended, is allowable over the combination of Newcombe and Chang because none of these references, either alone or in combination, discloses, teaches or suggests at least the following elements as recited in this amended claim (with emphasis added):

**"if comparing determines that the client specific data meet the first threshold of validity, proceed with authentication by comparing the client specific data with data stored in a second cache memory to determine whether the client specific data meet a second threshold of validity and whether the client specific data correspond to an identity previously determined to be valid or invalid;**

**"if the client specific data meet the second threshold, transmitting a request for verification to a database containing client-specific data."**

[0057] The Examiner admits (Action, p. 16) that Newcombe does not disclose the use of a cache memory or "further specific functions of the server as claimed." The Examiner thus must rely on Chang to show the use of a cache memory and "further specific functions" as recited in claim 61.

**[0058]** The Examiner indicates (Action, p. 16) that Chang, at col. 4, lines 17-24, and at col. 6, lines 2-3 and 47-50, discloses a second cache memory, a second threshold of validity, and “whether the client specific data correspond to an identity previously determined to be valid or invalid.” The Applicant respectfully disagrees.

**[0059]** For convenience, Chang, col. 4, lines 17-24, is presented here:

In one embodiment, a Smart card or Token card is used to obtain an OTP that can be used to establish a session with the network access server. In response to entering the  
15 username and one-time password, a user authorization phase is performed to determine whether a session should be established for the particular user. To perform the user authorization phase, the network access server forwards the username and one-time password to an authorization,  
20 authentication, and accounting (AAA) server to request authorization for establishing a session. The AAA server determines whether the username and OTP were previously cached in its memory and if so, whether the username and OTP are still valid.

**[0060]** As can be seen, Chang discloses a “username and one-time password” (OTP) and a “server determines whether the username and OTP were previously cached in memory.” There is just a single or first cache memory in this portion of Chang. Further, in this passage of Chang, there is no disclosure, teaching or suggestion of “data stored in a second cache memory” and determining if “whether the client specific data meet a second threshold of validity” as recited in claim 61, as amended. Thus, this portion of Chang does not support the Examiner’s assertion.

**[0061]** Chang, col. 6, lines 2-3, state the following:

As depicted AAA server **126** includes a cache that may be used to store username and one-time password information.

**[0062]** Chang, col. 6, lines 47-50, is presented here for convenience:

Conversely, if the OTP is not valid, at block **316** the AAA server **126** sends a message to network access server **104** indicating that a session can not be established based on the user identification information.

**[0063]** As can be seen, Chang discloses sending a message to a "network access server" that a "session can not be established." On the other hand, claim 61, as amended, recites a second cache memory, a second threshold of validity, and "whether the client specific data correspond to an identity previously determined to be valid or invalid" **after** or if "comparing determines that the client specific data meet the first threshold of validity." These passages in col. 6 of Chang, do not disclose, teach or suggest "data stored in a second cache memory" and determining if "whether the client specific data meet a second threshold of validity" as recited in claim 61, as amended. Thus, this portion of Chang does not support the Examiner's assertion.

**[0064]** Further, the Examiner asserts that Chang, at col. 6, lines 47-50, discloses "transmitting a request for verification to a database." However, as can be seen in this passage of Chang, there is only the sending of "a message to a network access server." Sending a message is not the same what is recited in claim 61. Specifically, claim 61, as amended, recites "if the client specific data meet the second threshold, transmitting a request for verification to a database

containing client-specific data.” Thus, as required by claim 61, two thresholds of validity must be met before sending a request to a database. Chang does not disclose a database, but a server. A server is not the same as a database. Further, as shown above, Chang does teach or suggest a database for verification of a request, especially with the requirement of passing two thresholds of validity. Newcombe is also unavailing.

[0065] Accordingly, the combination of Newcombe and Chang does not disclose, teach or suggest all of the claimed elements or features of claim 61. Accordingly, Applicant respectfully asks the Examiner to withdraw the rejection of this claim, as amended.

Dependent Claims 62-68

[0066] These claims ultimately depend upon independent claim 61. As discussed above, claim 61 is allowable. It is axiomatic that any dependent claim which depends from an allowable base claim is also allowable. Additionally, some or all of these claims may also be allowable for additional independent reasons.

[0067] For example, claim 63, as amended, recites the following features (with emphasis added):

“store . . . at least a portion of the client specific data **in the second cache memory** along with an **indication that the client specific data do not correspond to a valid client if comparing determines** that the client specific data **do not meet the first threshold.**”

**[0068]** The Examiner asserts the following in regard to this claim:

In reference to Claim 63, Newcombe and Chang further discloses storing at least a portion of the client specific data in a second cache memory along with an indication that the client specific data do not correspond to a valid client if it is determined that the client specific data do not meet the first threshold (Newcombe, paragraphs 0025, 0042, 0047-0048; Chang, column 4, lines 17-24; column 6, lines 2-3 and 47-50).

**[0069]** The Applicant respectfully disagrees that these references teach or suggest each and every feature of claim 63.

**[0070]** First, as shown above, the passages of Chang cited by the Examiner do not disclose a "second cache memory." As to Newcombe, paragraphs 0025, 0042, and 0047-0048, disclose the use of two servers and a timestamp, two IP addresses, and a hashed salted password. These passages also disclose forwarding a user ticket and authenticating and validating clients through the user ticket.

**[0071]** However, after a thorough review of these passages, there is no disclosure, teaching or suggestion of a "second cache memory" or the storing of an "indication that the client specific data do not correspond to a valid client" in the second cache memory. Thus, neither, Chang, Newcombe, nor the combination of these two references, supports the Examiner's assertion that these features of claim 63 are taught or disclosed therein. Accordingly, claim 63 is allowable over the combination of these two references based on these additional features. The Applicant respectfully asks the Examiner to withdraw the rejection of claim 63 on this additional basis.

Independent Claim 69

[0072] The Applicant asserts that claim 69, as amended, is allowable over the combination of Newcombe and Chang because none of these references, either alone or in combination, discloses, teaches or suggests at least the following elements as recited in this amended claim (with emphasis added):

“if comparing determines that the client-specific data **do not meet the first threshold of validity**, then **storing** the name, the client key, and validity/invalidity indicators **in a second cache memory**, wherein the name stored in the second cache memory is **associated with a validity indication** regardless of whether the client key or the proof of knowledge for the client key matches data in an associated authentication database, and terminating the verification process.”

[0073] The Examiner admits (Action, p. 18) that Newcombe does not disclose the use of a cache memory. The Examiner thus must rely on Chang to show the use of a cache memory, and the functions associated with the cache memory, as recited in claim 69.

[0074] The Examiner indicates (Action, p. 19) that Chang, at col. 4, lines 17-24, and at col. 6, lines 2-3 and 47-50, discloses a second cache memory and “storing” various information “in a second cache memory, wherein the name stored in the second cache memory is associated with a validity indication.” The Applicant respectfully disagrees.

[0075] For convenience, these passages of Chang have been presented above in reference to other claims and are not repeated here. As was shown in reference to the other independent claims including claim 1, Chang discloses a

"username and one-time password" (OTP) and a "server determines whether the username and OTP were previously cached in memory." There is just a single or first cache memory in Chang. However, in these passages and other portions of Chang, there simply is no disclosure, teaching or suggestion of data being stored in a second cache memory, especially where "the name stored in the second cache memory is associated with a validity indication" with the qualification that this storing is only done "if [the first] comparing determines that the client-specific data do not meet the first threshold of validity." Thus, Chang does not support the Examiner's rejection of claim 69 in view of the specific language recited in claim 69, as amended.

[0076] Accordingly, the combination of Newcombe and Chang does not disclose, teach or suggest all of the claimed elements or features of claim 69. Accordingly, Applicant respectfully asks the Examiner to withdraw the rejection of this claim, as amended.

#### Independent Claim 70

[0077] The Applicant asserts that claim 70, as amended, is allowable over the combination of Newcombe and Chang because none of these references, either alone or in combination, discloses, teaches or suggests at least the following elements as recited in this amended claim (with emphasis added):

**"if comparing determines that the first client specific data do not meet the first threshold of validity, then storing** a portion of the client specific data **in a second cache memory** along with an

**indication that the client specific data do not correspond to a valid client**, the portion of the client specific data stored in the second cache memory identifying a client name associated with the client authentication request and **associating the client name with a validity indication** regardless of whether the client specific data included valid proof of knowledge of privileged data, and then terminating the verification process.”

[0078] The Examiner admits (Action, p. 19) that Newcombe does not disclose the use of a cache memory. The Examiner thus must rely on Chang to show the use of a cache memory, and the functions associated with the cache memory, as recited in claim 70.

[0079] The Examiner rejects claim 70 on substantially the same basis as claim 69 and indicates (Action, p. 19) that Chang, at col. 4, lines 17-24, and at col. 6, lines 2-3 and 47-50, discloses a second cache memory and “storing” various information “in a second cache memory, wherein the name stored in the second cache memory is associated with a validity indication.” The Applicant respectfully disagrees.

[0080] For convenience, these passages of Chang have been presented above in reference to other claims and are not repeated here. As was shown in reference to the other independent claims including claim 1, Chang discloses a “username and one-time password” (OTP) and a “server determines whether the username and OTP were previously cached in memory.”

[0081] There is just a single or first cache memory in Chang. However, in these passages and other portions of Chang, there simply is no disclosure,



teaching or suggestion of data being stored in a second cache memory, especially where “the name stored in the second cache memory is associated with a validity indication” with the qualification that this storing is only done “if [the first] comparing determines that the client-specific data do not meet the first threshold of validity.” Thus, Chang does not support the Examiner’s rejection of claim 70 in view of the specific language recited in claim 70, as amended.

**[0082]** Accordingly, the combination of Newcombe and Chang does not disclose, teach or suggest all of the claimed elements or features of claim 70. Accordingly, Applicant respectfully asks the Examiner to withdraw the rejection of this claim, as amended.

#### *Dependent Claims 71-74*

**[0083]** These claims ultimately depend upon independent claim 70. As discussed above, claim 70 is allowable. It is axiomatic that any dependent claim which depends from an allowable base claim is also allowable. Additionally, some or all of these claims may also be allowable for additional independent reasons.

#### **Dependent Claims**

**[0084]** If not previously addressed individually, in addition to its own merits, each dependent claim is allowable for the same reasons that its base claim is

allowable. Applicant requests that the Examiner withdraw the rejection of each dependent claim where its base claim is allowable.

### **Conclusion**

[0085] All pending claims are in condition for allowance. Applicant respectfully requests reconsideration and prompt issuance of the application. If any issues remain that prevent issuance of this application, the **Examiner is urged to contact me before issuing a subsequent Action.** Please call/email me or my assistant at your convenience.

Respectfully Submitted,

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Dated: 2008-07-23

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